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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

)	Case No 3:20-cv-3243
Dana Bryant and Michael Bryant, d/b/a)	
Crossing the Jordan,)	[PROPOSED] TEMPORARY
Plaintiffs,)	RESTRAINING ORDER AND
)	ORDER TO SHOW CAUSE WHY
vs.)	PRELIMINARY INJUNCTION
)	SHOULD NOT ISSUE
Gavin Newsom, in official capacity as)	
Governor of California;)	
Xavier Becerra, in official capacity as Attorney)	
General of California;)	
Sonia Y. Angell, in official capacity as State)	
Public Health Officer;)	
Dr. Sundari Mase, in official capacity as Public)	
Health Officer of County of Sonoma;)	
Mark Essick, in official capacity as Sheriff of)	
Sonoma County;)	
Susan Gorin, in official capacity as Sonoma)	
County Supervisor;)	
David Rabbitt, in official capacity as Sonoma)	
County Supervisor;)	
Shirlee Zane, in official capacity as Sonoma)	
County Supervisor;)	
James Gore, in official capacity as Sonoma)	
County Supervisor;)	
Lynda Hopkins, in official capacity as Sonoma)	
County Supervisor;)	
Rainer Navarro, in official capacity as Chief of)	
Santa Rosa Police Department;)	
Santa Rosa, California,)	
)	
Defendants.)	

The Court GRANTS the application for a temporary restraining order filed by Plaintiffs Dana and Michael Bryant d/b/a Crossing the Jordan against Defendants Gavin Newsom, in his official capacity as Governor of California; Xavier Becerra, in his official capacity as Attorney General of California; Sonia Y. Angell, in her official capacity as the State Public Health Officer, Sundari Mase, in official capacity as Sonoma County Health Officer, Mark Essick in official capacity as Sonoma County Sheriff, [Susan Gorin, David Rabbitt, James Gore, Lynda Hopkins and Shirlee Zane] in their official capacities as members of the Sonoma County Board of Supervisors, Rainer Navarro, in official capacity as Chief of Santa Rosa City Police Department, and the City of Santa Rosa.

The Court ENJOINS Defendants, as well as their agents, employees, and successors in office, from enforcing, attempting to enforce, threatening to enforce, or otherwise requiring compliance with any prohibition of the State Order dated March 19, 2020 or the County Order dated March 17, 2020, or any recent amendments to such orders which prevents Plaintiffs from operating their stores, including permitting customers to enter the stores to browse selections and make purchases.

The Court ENJOINS Defendants, as well as their agents, employees, and successors in office, from enforcing, attempting to enforce, threatening to enforce, or otherwise requiring compliance with any prohibition of the State Order dated March 19, 2020 or any amendments to such orders which prevents any similarly situated business in California from operating their stores.

Unless the Court enters this Temporary Restraining Order, Plaintiffs and other Californians will suffer irreparable harm. The government has substantially burdened and plans to continue to substantially burden the fundamental rights Plaintiffs and of millions of other Californians to work and support themselves and their families.

Notice to the Defendants before entering this Temporary Restraining Order is not necessary. The facts in the Complaint clearly show that immediate and irreparable injury, loss, or damage will result to Plaintiffs and all Californians who wish to freely exercise their rights to travel and liberty will result before Defendants may be heard in opposition. Matthew Becker, Plaintiffs' lawyer, certified that he sent Defendants a copy of the Complaint before the filing of this Application for Temporary Restraining Order.

The Court issues this Temporary Restraining Order without notice because of the immediate and ongoing harm to the fundamental constitutional rights to travel and liberty. Providing notice to Defendants before entering this Temporary Restraining Order would be impractical in such a short period of time.

Plaintiffs do not need to post a security bond because enjoining Defendants from prohibiting Plaintiffs' exercise of their rights to travel and liberty that comply with the CDC guidance on social distancing does not interfere with Defendants' rights.

The Court GRANTS Plaintiffs' request for Oral Argument. The Court will hold a telephonic hearing on the preliminary injunction motion on the ____ day of _____, 2020, at ____:____ M.

1 The Court ORDERS Plaintiffs' lawyers to serve a copy of this Temporary Restraining
2 Order on Defendants.

3 IT IS SO ORDERED.

4 Dated:

5 _____
6 JUDGE